

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**IN RE PUDA COAL SECURITIES INC.  
ET AL. LITIGATION**

Case No: 1:11-CV-2598 (KBF)

CLASS ACTION

ECF Case

**NOTICE OF PLAINTIFFS' MOTION TO ENTER DEFAULT JUDGMENT  
AGAINST DEFENDANTS PUDA COAL, INC. AND MING ZHAO**

PLEASE TAKE NOTICE that as soon as the matter may be heard before the Honorable Katherine B. Forrest, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 15A, New York, New York 10007, Plaintiffs will move the Court for an Order, pursuant to Rule 55(b) of the Federal Rules of Civil Procedure and Rule 55.2 of the Local Civil Rules for the United States District Courts for the Southern and Eastern District of New York, entering a default judgment against defendants Puda Coal, Inc. and Ming Zhao.

This Motion is based upon the accompanying Memorandum of Law and the Declaration of Laurence Rosen and exhibits, dated July 7, 2014 filed herewith.

Dated: July 7, 2014

New York, New York

**THE ROSEN LAW FIRM, P.A.**

By: /s/ Laurence M. Rosen  
Laurence M. Rosen  
Sara Fuks  
Yu Shi  
275 Madison Avenue, 34th Floor  
New York, New York 10016  
Telephone: (212) 686-1060  
Facsimile: (212) 202-3827  
E-mail: info@rosenlegal.com

**GLANCY BINKOW & GOLDBERG LLP**

Robin B. Howald (RH-9974)  
122 East 42nd Street, Suite 2920  
New York, New York 10168  
Telephone: (212) 682-5340  
Facsimile: (212) 884-0988  
E-mail: rhowald@glancylaw.com

-and-

Lionel Z. Glancy  
Joshua L. Crowell (JC-0914)  
1925 Century Park East, Suite 2100  
Los Angeles, California 90067  
Telephone: (310) 201-9150  
Facsimile: (310) 201-9160

***Co-Lead Counsel for Plaintiffs and the Class***

**POMERANTZ LLP**

Marc I. Gross  
Jeremy A. Lieberman  
Emma Gilmore  
Michael J. Wernke  
600 Third Avenue, 20th Floor  
New York, New York 10016  
Telephone: (212) 661-1100  
Facsimile: (212) 661-8665

-and-

Patrick V. Dahlstrom  
Leigh Handelman Smollar  
10 South LaSalle Street, Suite 3505  
Chicago, Illinois 60603  
Telephone: (312) 377-1181  
Facsimile: (312) 377-1184

**KAPLAN FOX & KILSHEIMER LLP**

Federic S. Fox  
Jeffrey P. Campisi  
Pamela A. Mayer  
850 Third Avenue  
New York, New York 10022  
Telephone: (212) 687-1980  
Facsimile (212) 687-7714

**KIRBY MCINERNEY LLP**

Daniel Hume  
David E. Kovel  
J. Brandon Walker  
825 Third Avenue, 16th Floor  
New York, New York 10022  
Telephone: (212) 371-6600  
Facsimile: (212) 751-2540

*Additional Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY THAT ON THIS 7<sup>th</sup> DAY OF July 2014, a true and correct copy of: the Notice of Plaintiffs' Motion to Enter Default Judgment Against Defendants Puda Coal, Inc., and Ming Zhao; Memorandum of Law in Support thereof; Declaration of Laurence Rosen in support thereof and exhibits thereto, was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Sara E. Fuks